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August 24, 2015

**VIA E-MAIL TRANSMISSION
AND ECF FILING**

The Honorable Robert E. Gerber
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004

**Re: In re Motors Liquidation Company, et al.
Case No. 09-50026 (REG)**

Letter Regarding Update on Related Proceedings

Dear Judge Gerber:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC (“**New GM**”) in the above-referenced matter. Pursuant to Your Honor’s Endorsed Order dated May 5, 2015 [Dkt. No. 13131], we write to update the Court regarding developments in proceedings relating to New GM’s Motions to Enforce. Specifically,

1. On Friday, August 21, 2015, New GM filed with the United States Court of Appeals for the Second Circuit, the *Motion by General Motors LLC To (I) Consolidate Cases Petitioning For Direct Appeal Of Judgment, and (II) Include an Additional Related Appeal* (“**Consolidation Motion**”). A copy of the Consolidation Motion is attached hereto as **Exhibit A**.
2. Also on Friday, August 21, 2015, New GM and Lead Counsel, after having met and conferred with each other as well as with counsel for the other Defendants, filed with the United States District Court for the Southern District of New York, a joint letter setting forth the parties’ tentative agenda for the August 28, 2015 Status Conference in MDL

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2543. A copy of the joint letter is attached hereto as **Exhibit B.**

Respectfully submitted,

/s/ Scott Davidson

Scott Davidson

SD/hs
Encl.

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